

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

MICHAEL S. KIMM, ESQ. (MK4476)

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Attorneys for Sang Chul Lee and Dukson Lee

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In re: : Chapter 11
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GENERAL MOTORS, et al. : Case No. 09-50026 (REG)
:
Debtors. : (Jointly Administered)
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**NOTICE OF MOTION BY CREDITORS SANG CHUL
LEE AND DUKSON LEE TO ALLOW LATE CLAIM
FILED TO BE DEEMED TIMELY FILED**

PLEASE TAKE NOTICE that upon the Motion of Creditors, Sang Chul Lee and Dukson Lee to Allow Late Claim Filed to be Deemed Timely Filed, a hearing will be held before the **Honorable Robert E. Gerber, United States Bankruptcy Court, Southern District of New York**, One Bowling Green, Courtroom 621, New York, New York 10004, on April 8, 2010, at 9:45AM or as soon thereafter as counsel can be heard, for an order granting Creditors' Motion to Allow Late Claim Filed to be Deemed Timely Filed.

PLEASE TAKE FURTHER NOTICE that Creditors' Motion will base based upon this notice, the accompanying brief of law, the accompanying Declaration of Michael S. Kimm, and the record herein.

Any opposition not received by the date set forth will be deemed waived.

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and Local Rules of Bankruptcy Court, and shall be filed with the Bankruptcy Court electronically, and in accordance with General Order M-242 by registered users of the Bankruptcy Court's case filing system, with a hard copy delivered directly to Chambers, and shall be served upon **Michael S. Kimm, counsel for creditors, Sang Chul Lee and Dukson Lee, at 41W Bancker Street, Englewood, New Jersey 07631.**

PLEASE TAKE FURTHER NOTICE, that unless objections are timely filed and received by the Court, the Court may grant the relief requested herein.

PLEASE TAKE FURTHER NOTICE that the hearing may be adjourned from time to time without further notice other than the announcement of such adjournment in open court or by posting of such adjourned date on the Court's calendar on the aforementioned date.

Dated: March 22, 2010

/s/ Michael S. Kimm
Michael S. Kimm

Certificate of Service

Michael Kimm, Esq., certifies that the foregoing was served by ECF on all parties, or their counsel.

Dated: March 22, 2010

/s/ Michael Kimm
Michael S. Kimm